



**SKIFF
LAW**

Gregory J. Skiff, *Founder*
gjs@skifflaw.com

June 6, 2019

Via CM/ECF and Facsimile (973.645.4549)

Honorable Joseph A. Dickson
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Court Room MLK 2D
Newark, New Jersey 07101

***Re: Marimar Textiles, Inc. v. Jude Connally, et al.
United States District Court, District of New Jersey
Civil Action Number 2:17-cv-02900-JLL-JAD***

Dear Judge Dickson:

This Firm represents plaintiff Marimar Textiles, Inc. ("Plaintiff") with respect to the above action. I write in furtherance of the Court's instructions at the last settlement conference directing the parties to submit a revised Scheduling Order for Your Honor's consideration.

Counsels for the parties reached an impasse because defendants' have sought to hinder Plaintiff's ability to extend fact discovery in the likely event the upcoming party depositions yield additional information requiring additional party and/or non-party discovery. Accordingly, Plaintiff submits the attached proposed order for Your Honor's consideration, which we believe is both reasonable and just under the circumstances. The parties have cooperated admirably up to this point, but Plaintiff cannot be asked to hamstring its efforts to procure a full, complete and accurate record simply because defendants have decided an arbitrary deadline is more advantageous to its defense of this action.

Thank you for your time and attention to this matter.

Respectfully,

SKIFF LAW FIRM LLC



Gregory J. Skiff

Enc.

Cermele & Wood LLP
2 Westchester Park Drive
Suite 110
White Plains, NY 10604
www.cw.legal

NY Office:
Of Counsel

NY Office:
Of Counsel

NY Office:
Of Counsel